

382766

SKF USA Inc.

SKF

October 2, 1997

King of Prussia, PA
USAU. S. EPA - Region III
841 Chestnut Street
Philadelphia, PA 19107

ATTN: Gary W. Morton (3HW11)

RE: Malvern TCE Superfund Site (Malvern, Pennsylvania)

Dear Mr. Morton:

Upon review of the volumetric ranking summary (VRS), regarding the above referenced site, SKF disputes the waste-in determinations made by EPA. According to the VRS, SKF is charged with sending 260.36 drums of waste materials to the Chemcene site, when in fact according to the documentary evidence, SKF sent only 96.36 drums to the Chemcene Site.

According to the enclosed invoices, 120 drums were in fact sent to Resources Technology Services, Inc. (RTS) for handling and disposal; Chemcene acted only as the transporter. This is confirmed in the attached letter from Mr. Jeff Lupo of Chemcene to Mr. Larry Luder of SKF dated February 22, 1985. Mr. Lupo also lists in this correspondence the disposal location for each waste.

Therefore, SKF hereby requests that EPA delete the following drums from the Chemcene waste-in list.

<u>WASTE</u>	<u>DRUMS</u>	<u>INVOICED BY RTS</u>
GREASE	16	YES
GREASE	2	NO
CUTTING OIL	8	YES
HEAT TREAT SALTS	63	YES
HYDROCHLORIC ACID	2	YES



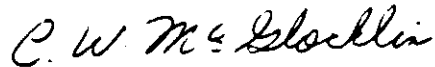
*U. S. EPA - Region III
Gary W. Morton (3HW11)
Page 3*

This listing equates to a reduction of 164 drums from the waste-in list identified in the VRS; thus reducing SKF's total number to 96.36 drums of solvent and solvent related materials.

Further, not only does the enclosed information evidence that this material was neither handled nor deposited at the Chemcene site, none of these materials contain the contaminants of concern identified in the RI/FS.

SKF, therefore, requests a redetermination that the allocated volume be reduced to 96.36 drums. If you have questions or comments, do not hesitate to contact me at (610) 962-4467.

Sincerely,



C. William McGlocklin
Director of Environmental Affairs

Attach.
CWM/tc

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 8/12/97

PRP Name: S K F Industries Inc.

Page 2 of 2

Invoice Date	Order Number	Invoice Number	Manifest Number	Waste Description	Quantity	Counted Toward Ranking
11/10/83	776	11686	PAA 4768245	WASTE GREASE	1.00	Yes
11/10/83	776	11686	PAA 4768245	WASTE SALTS	9.00	Yes
6/10/83	646	11310	NA	WASTE LIME	9.00	Yes
7/16/84	1030	12248	PAA 12435546	WASTE 1,1,1 TRICHLOROETHANE	5.36	Yes
10/3/84	1101	12431	PAB 00889070	WASTE PETROLEUM OIL & BARIUM	5.00	Yes
10/3/84	1100	12431	PAB 00889070	WASTE PETROLEUM NAPHTHA	2.00	Yes
10/3/84	1102	12431	PAB 00889066	WASTE HAZARDOUS NOS (CALCIUM OXIDE	12.00	Yes
6/10/83	641	11310	PAA 4766915	WASTE GREASE	2.00	Yes
7/29/83	687	11430	PAA 4767405	WASTE GREASE	2.00	Yes
6/30/83	NA	11356	NA	17-H DRUMS	2.00	No
4/10/85	4971	12855	PAB 00890912	OIL & BARIUM. SULFURIC ACID, POTASSIUM	4.00	No
6/10/83	641	11310	PAA 4766916	WASTE 1,1,1 TRICHLOROETHANE	2.00	Yes
6/30/83	666	11356	PAA 476221	WASTE GREASE	2.00	Yes
6/30/83	666	11356	PAA 4767221	WASTE WATER SOLUBLE OIL	8.00	Yes
4/10/85	1310	12855	PAB 0890912	WASTE FREON	1.00	Yes
4/10/85	1309	12855	PAB 00890912	WASTE OIL AND BARIUM	1.00	Yes
6/3/83	NA	2487	NA	WASTE GREASE	2.00	Yes
5/2/83		11291	NA	17-H DRUMS	2.00	No
4/10/85	1308	12855	PAB 00890912	WASTE ASBESTOS	1.00	Yes
4/10/85	1307	12855	PAB 00890934	WASTE 1,1,1 TRICHLOROETHANE	2.00	Yes
5/2/83	613	11291	NA	WASTE ALCOHOL	2.00	Yes
4/10/85	1306	12855	PAB 00890934	WASTE ETHYL ALCOHOL	1.00	Yes
5/20/85	NA	4971	NA	WASTE CORROSIVE LIQUID	1.00	Yes
11/13/85	1538	13313	PAB 00892920	WASTE 1,1,1 TRICHLOROETHANE	2.00	Yes
11/13/85	1537	13313	PAB 00892920	WASTE PETROLEUM NAPHTHA	17.00	Yes
Total Waste Counted Towards Ranking					260.36	

Isopar, 291E (less Barrium) - Waste Petroleum Naptha, combustable liquid, I, D001 - \$55.00 per drum. To be blended, then burned as fuel.

These next materials we have not yet moved for SKF. They are listed in the same manner.

Battery Acid - Waste Sulfuric Acid, Spent, Corrosive Material UN1830 C, D002 -\$230.00 per drum. To be neutralized by SCA Inc., Newark, N.J. or Environmental Enterprises, Inc. Cincinnati, Ohio. This material when inspected was in a non-transportable container. We can provide a polyethylene drum for \$40.00. If we are required to re-drum the material \$30.00.

Freon - Hazardous Waste Liquid nos. (trichloromonoflouroethane), ORM-E, NA9189, T, F001 - \$108.50/15 gal. drum. To be incinerated by Environmental Waste Recovery, Waterbury, Conn. or Atsea Incineration, Philadelphia, PA. !

Prekote cleaner- Waste Corrosive liquid nos (hydrochloric acid), Corrosive Material, UN 1789,C, D002 - \$230.00 per drum. To be neutralized by SCA, Newark. This material will have to be overpacked in a 17-H drum - \$25.00

Mineral Oil - One drum, manifested as non-hazardous, \$35.00 Must be re-drumed. If we re-drum -\$30.00. This material will be mixed with other oils and recycled by Total Recovery, Devault, PA.

Aluminum Oxide - Waste aluminum Oxide, manifested as non-hazardous. - \$205/55 gal drum. The four fiber containers will have to be overpacked into 17-H's, \$25.00/17-H. The one 15 gallon drum will cost \$198.00 for disposal. This material will be landfilled by SCA, Pinewood, South Carolina.

Flake Asbestos - Waste asbestos, manifested non-hazardous \$205.00 per drum. Material to be landfilled CWM, Emile, Alabama or SCA, Pinewood, S.C. This material must be overpacked into a M-H-\$25.00.



INVOICE

RESOURCE TECHNOLOGY SERVICES, INC.
6 BERKELEY ROAD
DEVON, PA 19333
(215) 687-4592

INVOICE № 4971

DATE: d 5/20/85

YOUR P.O. NO: J. Lupo

RTS JOB NO:

76-5B-85
000760

TERMS: NET 15 DAYS

000060

TO: Chemclene
Box 26, RD 1
Malvern, PA 19355
Attn: Jeff Lupo

DATE	DESCRIPTION	UNIT PRICE	AMOUNT
4/10/85	Disposal of Hazardous Waste at SKF Industries		
	<u>Disposal</u>		
	Manifest No. PAB 00890912		
	1-55 gal Drum of Hazardous Waste Liquid, n.o.s. (Oil & Barium) ORM-E	100.00/drum	\$100.00
	1-55 gal Drum of Waste Sulfuric Acid, Spent	150.00/drum	150.00
	1-Drum of Waste Corrosive Liquid, n.o.s. (Potassium Hydroxide)	58.50/drum	58.50
	1-Drum of Non-Hazardous Waste Asbestos	155.00/drum	155.00
	<u>Other</u>		
	3-MCS-(Material Characterization Approval)	35.00/each	105.00
	1 - <i>PMCO</i> 1 - 1 - <i>ALL SILE</i>		
	Total		\$568.50

PAID
CHECK NO. 13819
DATE 8/22/85

OVERDUE BALANCE SUBJECT TO AN INTEREST CHARGE OF 1½% PER MONTH

PA

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PENNSYLVANIA 19355

February 22, 1985

WAIT FOR
RTS BILL
CITIZEN
PRICES WITH TITLES

SKF Industries
5400 Tulip Street
Phila., PA. 19124
Attn: Larry Luder

Gloyd
charges are

RTS
PRICES

Dear Mr. Luder,

The following is a list of SKF waste materials with costs for disposal, proper manifesting, and place of final destruction.

Waste Salts - Waste Potassium Nitrate mixed with Sodium Nitrate, Oxidezer, UN1487, I, D001 - \$265.00 each drum. To be landfilled by Chemical Waste Management, Inc. Emile, Alabama.

Lime Sludge - Hazardous Waste lig. nos (calcium oxide and chromium), ORM-E, NA9189, liquid E, D007 - \$265.00 per drum. To be land filled by CWM, Inc. Emile, Alabama, or SCA. Inc., Pinewood, South Carolina.

Ferrocote - Hazardous Waste Liquid nos (oil and Barrium), ORM-E, NA9189, E, D005 - \$150.00 per drum. This material will be incinerated by Oldover Inc. Arvonnia, Virginia.

Cosmoline & 291E - Waste Petroleum Oil and Barrium, combustible liquid, UN1268, liguis I, E, D001 - \$55.00 each drum. To be blended as a fuel extender by Delaware Container, Coatsville, PA. burned as fuel by Keystone Cement in Bath, PA.

Waste Trichlorethylene - Waste 1,1,1-Trichloroethane, ORM-A, UN2831, T, F001 - \$40.00 each drum. To be recycled by Chem-clene Corporation with final still bottom to be blended as as fuel extender.

Alcohol - Waste Ethyl Alcohol, flammable liquid, I, T D001 \$55.00 per drum. To be blended by Delaware Container, Coatesville, burned as fuel by Keystone Cement.

I/TM
#1 { One
To
RTS

#5 { One
To
RTS

#3 { One
To
US

#4 { One
To
US

not for
Leake

One Dr
at \$150

2 dr
at \$40

One dr
at \$5



INVOICE

RESOURCE TECHNOLOGY SERVICES, INC.
6 BERKELEY ROAD
DEVON, PA 19333

(215) 687-4592

INVOICE No. 2621

DATE: 8/15/83

YOUR P.O. NO: verbal

RTS JOB NO: 76-15-83

TO: Chemclene Corp.
258 N. Phoenixville Pike
Malvern, PA 19355
Attn: Accounts Payable

TERMS: NET 15 DAYS

DJA

DATE	DESCRIPTION	UNIT PRICE	AMOUNT
6/30/83	Disposal of Hazardous Materials.		
	<u>Cantol, Inc.</u>		
	-(1) drum Waste Sodium Dichromate	65.00/drum	65.00
	-(1) drum Waste Sodium Hydroxide Solution	55.00/drum	55.00
	-(1) drum Waste Methylprolidone	40.00/drum	40.00
	-(1) drum Waste Floor Wax	55.00/drum	55.00
	<u>SKF Industries</u>		
	-(2) drums Waste Grease	75.00/drum	150.00
	-(8) drums Waste Cutting Oils	40.00/drum	320.00
		Total	\$685.00

PA

PAID
CHECK No. 12559
DATE 11-6-83

OVERDUE BALANCE SUBJECT TO AN INTEREST CHARGE OF 1½% PER MONTH



INVOICE

RESOURCE TECHNOLOGY SERVICES, INC.
6 BERKELEY ROAD
DEVON, PA 19333
(215) 687-4592

INVOICE No 2987

DATE: 11/30/83

YOUR P.O. NO: verbal

RTS JOB NO: 76-22-83, 76-23-83
76-24-83, & 76-25-83

TO: Chemclene Corp.
258 N. Phoenixville Pike
Malvern, PA 19355
Attn: Accounts Payable

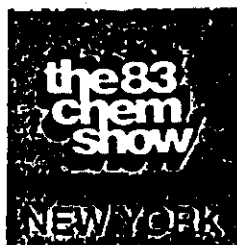
TERMS: NET 15 DAYS

DJA

DATE	DESCRIPTION	UNIT PRICE	AMOUNT
10/7/83 PO	Disposal of Hazardous Materials. <u>Malco</u> -(1) drum Waste Ammonium Hydroxide Solution	80.00/drum (115)	80.00
10/26/83 PO	<u>SKF Industries</u> -(14) drums Waste Potassium Nitrate mixed with Sodium Nitrate	150.00/drum (180)	2,100.00
11/10/83 PO	<u>SKF Industries</u> -(3) drums Waste Sodium Hydroxide Solid -(9) drums Waste Potassium Nitrate mixed with Sodium Nitrate -(1) drum Waste Grease -(4) drums Waste Soap Crystals -Labor & Material to repackage 6 Fiber-Packs	85.00/drum (110) 150.00/drum (160) 75.00/drum (95) 82.00/drum (110) 35.00/drum	255.00 1,350.00 75.00 328.00 210.00 (3)
11/15/83	<u>Viz Manufacturing</u> -(1) drum Waste Copper Cyanide Solution	150.00/drum (190)	150.00
Total			\$4,548.00 (565 ↑ W.C. 11/2 C.W. 11/2 249 G.M. 8/2)

PA

SEE OUR EXHIBIT



Coliseum
December 5-8, 1983

PAID

CHECK NO. 12755
DATE 1-20-84

OVERDUE BALANCE SUBJECT TO AN INTEREST CHARGE OF 1½% PER MONTH



INVOICE

RESOURCE TECHNOLOGY SERVICES, INC.
6 BERKELEY ROAD
DEVON, PA 19333
(215) 687-4592

INVOICE N^o 2384

DATE: 5/27/83
YOUR P.O. NO:
RTS JOB NO: Verbal

TO: Chemcene Corporation
258 N. Phoenixville Pike
Malvern, PA 19355
Attn: Accts. Pay.

76-9-83

TERMS: NET 15 DAYS

DJA

DATE	DESCRIPTION	UNIT PRICE	AMOUNT
5/2/83	Disposal of Hazardous Materials		
	<u>SKF Industries</u>		
	-(1) drum Waste Nitric and Hydrochloric Acid	\$ 65.00/drum	\$ 65.00 65.00
	-(8) drums Waste Grease	75.00 75.00/drum	600.00 580.00
	-(1) drum Waste Wax	75.00 75.00/drum	75.00 72.50
	-(2) drums Waste Sodium Chlorate	75.00 75.00/drum	150.00 100.00
	-(2) 30 gal. drums Waste Sodium Chlorate	50.00/drum	100.00 100.00
		TOTAL	\$990.00 917.50

PA

PAID
#12472
31 AUG 83

OVERDUE BALANCE SUBJECT TO AN INTEREST CHARGE OF 1 1/2% PER MONTH



INVOICE

RESOURCE TECHNOLOGY SERVICES, INC.

6 BERKELEY ROAD

DEVON, PA 19333

(215) 687-4592

INVOICE No 2487

DATE: 6/30/83

YOUR P.O. NO: Verbal

RTS JOB NO: 76-11,12,13,14-83

TERMS: NET 15 DAYS

DAJ

TO: Chem Clene Corporation
253 N. Phoenixville Pike
Malvern, PA 19355
Attn: Accts. Pay.

DATE	DESCRIPTION	UNIT PRICE	AMOUNT
5/23/83	Disposal of Hazardous Materials <u>Cantol Inc.</u> -(2) drums Waste Sodium Chromate -(3) drums Waste Floor Wax -(2) drums Waste Water & Hexameta- phosphate -(2) drums Waste Water and Amino Methyl Propanol	\$ 65.00/drum 55.00/drum 65.00/drum 55.00/drum	\$ 130.00 165.00 130.00 110.00
6/3/83	<u>SKF Industries</u> -(2) drums Waste Grease	72.50/drum	145.00
6/14/83	<u>Leeds & Northrup</u> -(1) drum Waste Perolen Res -(2) drums Waste Rumbling : SKF	0/drum 0/drum	90.00 90.00
6/23/83	<u>Porter Instrument</u> -(7) drums Waste Cutting Oil <u>Chem Clene</u> -(1) drum Waste Polychlori: Biphenyls 33.69 ppm	0/drum 150.00/drum	315.00 150.00
TOTAL			\$1025.00

OVERDUE BALANCE SUBJECT TO AN INTEREST CHARGE OF 1 1/2% PER MONTH



INVOICE

RESOURCE TECHNOLOGY SERVICES, INC.
6 BERKELEY ROAD
DEVON, PA 19333

(215) 687-4592

INVOICE № 2622

DATE: 7/31/83

YOUR P.O. NO: verbal

RTS JOB NO:

76-17-83

TO:

Chem Clene Corp.
258 N. Phoenixville Pike
Malvern, PA 19355
Attn: Accounts Payable

TERMS: NET 15 DAYS

DJA

DATE	DESCRIPTION	UNIT PRICE	AMOUNT
------	-------------	------------	--------

7/29/83

Disposal of Hazardous Materials

SKF Industries

-(2) Drums Waste Grease

75.00/drum

150.00

Total

\$150.00

PA

PAID
CHECK No. 12559
DATE 10-6-83

OVERDUE BALANCE SUBJECT TO AN INTEREST CHARGE OF 1½% PER MONTH